

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

*In re: Kia Engine Litigation*

Case No.: 8:17-cv-00838-JLS-JDE

## DECLARATION OF ADAM GONNELLI

I, Adam Gonnelli, declare as follows:

1. I am a partner with the law firm The Sultz Law Group and have been admitted since 1997 to practice law in New York. I am counsel of record for plaintiffs in this case.

2. I have personal knowledge of the facts stated below. If called upon to do so, I could and would competently testify thereto.

3. I submit this declaration in support of the application for appointment of interim co-lead counsel under F.R.C.P. 23(g) filed by The Sultz Law Group (“Sultz Law”) and Sauder Schelkopf.

4. I have practiced in the field of class actions and complex litigation for my entire career. In 2016, I joined The Sultz Law Group as a partner. Since joining the firm, we have acted as lead counsel in numerous high-profile consumer fraud and false advertising class actions. For instance, we recently acted as lead counsel in the prosecution of the following representative consumer class actions:

- *Baumgarten v. Cleanwell, LLC*, (E.D.N.Y. 1:16-cv-01780)
- *Davenport, Sumner, et al. v. Discover Financial Services, et al.* (United States District Court for the Northern District of Illinois 15-cv-06052)
- *Foster, Andrew Tyler et al. v. L-3 Communications EOTECH, Inc., et al.* (United States District Court Western District of Missouri 15-cv-03519)

- *Hecht, Shea, et al. v. Wells Fargo Bank, N.A., et al.* (E.D.N.Y. 15-cv-02338)
- *Kaatz, Marie and Gagliardi, Abigail, et al. v. Hyland's Inc., et al.* (S.D.N.Y. 16-cv-00237)
- *Markos, Jaish et al. v. Russell Brands, LLC* (S.D.N.Y. 16-cv-4362)
- *Nicotra, Jennifer et al. v. Babo Botanicals, LLC* (E.D.N.Y. 16-cv-00296)
- *Principe, Mark et al. v. Edison Nation, LLC et al.* (E.D.N.Y. 15-cv-05453)
- *Rapoport-Hecht, Tziva, Tsan, Maggie, and Wildstein, Erica et al. v. Seventh Generation, Inc.* (S.D.N.Y. 14-cv-09087)
- *Run Them Sweet, LLC v. CPA Global, Ltd., et al.* (United States District Court Eastern District of Virginia 1:16-cv-1347)
- *Silva, Christopher et al. v. Smucker Natural Foods, Inc. and J.M. Smucker Co.* (E.D.N.Y. 14-cv-6154)
- *Vincent, Wesley, et al. v People Against Dirty, PBC. and Method Products, PBC.,* (S.D.N.Y. 7:16-cv-06936-NSR)

5. Sultz Law is headquartered in New York, and maintains offices in New Jersey and Pennsylvania. The firm is included in Martindale-Hubbell's Bar Register of Preeminent Lawyers for its class action practice. The firm's class action practice has been featured in numerous publications, including *Law360*, *Inside Counsel Magazine*, *Risk Management Magazine*, and *CNBC News*. In addition, the attorneys within the firm have written and lectured extensively on class action practice. Attached to this Declaration as Exhibit A is a true and correct copy of our firm resume.

6. Sultz Law is well positioned to serve as interim co-lead counsel in view of its attorneys' decades of experience successfully litigating class actions as plaintiff's counsel and as defense counsel.

7. For the reasons stated above, I submit that appointment of The Sultz Law Group and Sauder Schelkopf would be in the best interests of the plaintiffs and the class.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 17<sup>th</sup> day of April, 2018 at Red Bank, New Jersey.

/s/ Adam Gonnelli  
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